

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA :

v. :

RICHARD REINOSO-MARTE, and :
KATHRINE ALMONTE, :

Defendants :

No. 3:24-cr-233

(Judge Mannion)

INDICTMENT

THE GRAND JURY CHARGES:

COUNT 1

18 U.S.C. § 1349

(Conspiracy to Commit Bank Fraud and Wire Fraud)

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From in or about May 2022, the exact date being unknown to the Grand Jury, and continuing thereafter until in or about January 2023, in Luzerne County, in the Middle District of Pennsylvania, and elsewhere, the defendants,

**RICHARD REINOSO-MARTE, and
KATHRINE ALMONTE,**

did knowingly and intentionally combine, conspire, confederate and agree with other persons known and unknown to the Grand Jury, to:

- a. knowingly execute a scheme and artifice to defraud and to obtain the moneys, funds, credits, assets, and other property owned by and under the custody and control of financial

institutions whose deposits were insured by the Federal Deposit Insurance Corporation ("FDIC"), by means of material false and fraudulent pretenses, representations and promises, in violation of Title 18, United States Code, Section 1344; and

- b. with the intent to defraud and affecting a financial institution, knowingly devise and intend to devise a scheme and artifice to defraud, and to obtain money and property, by means of materially false and fraudulent pretenses, representations, and promises, and for the purpose of executing, advancing, furthering, and carrying out the scheme and artifice to defraud, knowingly transmitted and caused others to transmit by means of wire communication in interstate and foreign commerce writings, signs, signals, pictures, and sounds, in violation of Title 18, United States Code, Section 1343.

Manner and Means of the Scheme

It was part of the conspiracy and scheme and artifice to defraud that the defendants and their coconspirators employed the following manner and means, among others:

1. The coconspirators fraudulently obtained credit cards issued by FDIC-insured financial institutions in the names of victims of identity theft, without their knowledge or authorization.
2. The coconspirators created and caused others to create counterfeit means of identification bearing the likeness of RICHARD REINOSO-MARTE, but the names of other individuals, including in the

names of victims of identity theft corresponding to the fraudulently obtained credit cards.

3. The coconspirators used fraudulently obtained credit cards to make purchases on online retail platforms, including eBay and Amazon.

4. The coconspirators used fraudulently obtained credit cards to make purchases at retail businesses located in the Middle District of Pennsylvania, the State of New York, and elsewhere.

5. Between in or about May 2022 and January 2023, the coconspirators used and attempted to use fraudulently obtained credit cards to purchase in excess of approximately \$1,500,000 of goods and commodities.

All in violation of Title 18, United States Code, Section 1349.

THE GRAND JURY FURTHER CHARGES:

COUNTS 2 THROUGH 5
18 U.S.C. § 1344
(Bank Fraud)

The factual allegations of paragraphs 1 through 5 of Count 1 are incorporated here.

From in or about May 2022, the exact date being unknown to the Grand Jury, and continuing thereafter until in or about January 2023, in Luzerne County, in the Middle District of Pennsylvania, and elsewhere, the defendants,

RICHARD REINOSO-MARTE, and
KATHRINE ALMONTE,

aiding and abetting one another and aiding and abetting others, knowingly executed a scheme and artifice to defraud and to obtain the moneys, funds, credits, assets and other property owned by and under the custody and control of financial institutions whose deposits were insured by the FDIC, by means of material false and fraudulent pretenses, representations and promises.

The Execution of the Scheme

For the purpose of executing and attempting to execute the scheme and artifice to defraud, defendants RICHARD REINOSO-

MARTE and KATHRINE ALMONTE, aiding and abetting one another and aiding and abetting others, used fraudulently-obtained credit cards to execute the scheme by purchasing and attempting to purchase retail items, with each instance listed below being a separate count:

Count	Date	Approximate Amount of Transaction	Location
2	August 15, 2022	\$403.95	Home Depot in Wilkes-Barre, Pennsylvania
3	August 16, 2022	\$3,882.88	Home Depot in Wilkes-Barre, Pennsylvania
4	August 19, 2022	\$255.29	Home Depot in Wilkes-Barre, Pennsylvania
5	August 16, 2022	\$74.68	Petco in Edwardsville, Pennsylvania

All in violation of Title 18, United States Code, Sections 1344 and 2, and *Pinkerton v. United States*, 328 U.S. 640 (1946).

THE GRAND JURY FURTHER CHARGES:

COUNTS 6 THROUGH 11
Aggravated Identify Theft
18 U.S.C. § 1028A

From on or about August 15, 2022, to on or about November 30, 2022, in Luzerne County, in the Middle District of Pennsylvania, and elsewhere, the defendants,

RICHARD REINOSO-MARTE, and
KATHRINE ALMONTE,

aiding and abetting one another and aiding and abetting others, knowingly possessed, transferred and used, without lawful authority, a means of identification of another person, to wit, names and account numbers used to identify specific individuals, during and in relation to felony violations enumerated in Title 18, United States Code, Section 1028A(c), namely bank fraud, in violation of Title 18, United States Code, Section 1344, and wire fraud, in violation of Title 18, United States Code, Section 1343, knowing that the means of identification belonged to other actual persons, with each instance listed below being a separate count:

Count	Approximate Date	Description
6	August 15, 2022	Purchase at Home Depot in Wilkes-Barre, Pennsylvania, using a credit card issued in the name of P.L.
7	August 16, 2022	Purchase at Home Depot in Wilkes-Barre, Pennsylvania, using a credit card issued in the name of P.L.
8	August 19, 2022	Purchase at Home Depot in Wilkes-Barre, Pennsylvania, using a credit card issued in the name of P.L.
9	October 4, 2022	Purchase at Petco in Edwardesville, Pennsylvania, using a credit card issued in the name of P.L.
10	November 30, 2022	Possession of accredit card issued in the name of P.L.
11	November 30, 2022	Possession of accredit card issued in the name of C.F.

All in violation of Title 18, United States Code, Sections 2 and 1028A(a)(1), and *Pinkerton v. United States*, 328 U.S. 640 (1946).

FORFEITURE ALLEGATION

1. The allegations contained in Counts 1 through 11 of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Sections 982(a)(2) and 981(a)(1)(C) and Title 28, United States Code, Section 2461.

2. Upon conviction of the offenses in violation of Title 18, United States Code, Sections 1344 and 1349, and Title 18, United States Code, Section 1028A, the defendants,

**RICHARD REINOSO-MARTE, and
KATHRINE ALMONTE,**

shall forfeit to the United States of America, any property constituting or derived from proceeds obtained, directly or indirectly, as a result of such violations, pursuant to Title 18, United States Code, Sections 982(a)(2) and 981(a)(1)(C) and Title 28, United States Code, Section 2461. The property to be forfeited includes, but is not limited to:

- a. the real property located at 3081 South Main Street in
Hanover Township, Pennsylvania 18706;
- b. approximately \$80,772 in U.S. Currency;
- c. red Apple iPhone in a white case with gems;

- d. black Apple iPhone, serial number DNPDLISMJODXW,
IMEI number 353039112614160;
- e. black Motorola cellular phone, MEID number
99000572938587;
- f. white LG cellular phone, serial number 907VTID0832737;
- g. Samsung cellular phone, HEX number 35261809948933;
- h. black Samsung Galaxy S8, IMEI number 355979083827143;
- i. LG cellular phone, serial number 901VTLZ0153248;
- j. white Apple iPhone;
- k. silver Apple iPhone 5;
- l. 10 IP Cameras, item number 9SIAHWPHWW4192;
- m. black AeroCool computer tower serial number
HS21043046023;
- n. tan Coasts Swimming Pool and Spa Heater, serial number
2208054;
- o. Microsoft Windows tablet with keyboard;
- p. black and silver card skimmer;
- q. Hard drive, serial number WXCZ07048105;
- r. silver flash drive and blue flash drive;
- s. miscellaneous watches and jewelry; and

t. miscellaneous sneakers and shoes, clothing, tote bags and purses, and tools.

3. If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1) and Title 28, United States Code, Section 2461(c).

TRUE BILL



FOREPERSON

Date: 9-3-24

GERARD M. KARAM
United States Attorney

By:


SEAN A. CAMONI
Assistant United States Attorney